

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CUTBERTO VIRAMONTES, *et al.*,)
)
Plaintiffs,) No. 21 CV 4595
)
v.) Judge Rebecca R. Pallmeyer
) Magistrate Judge Susan E. Cox
THE COUNTY OF COOK, *et al.*,)
)
Defendants.)

**AGREED MOTION TO ADOPT CROSS-STATEMENTS
OF UNDISPUTED MATERIAL FACTS**

NOW COME the Defendants, the County of Cook, Toni Preckwinkle, Kimberly M. Foxx, and Thomas Dart, by and through their attorney, Kimberly M. Foxx, State's Attorney of Cook County, through her Assistant State's Attorney Jessica M. Scheller, by agreement with the Plaintiffs, Cutberto Viramontes, Christopher Khaya, the Second Amendment Foundation, and the Firearms Policy Coalition, Inc., now state as follows:

1. The parties have filed cross-motions for summary judgment.
2. Defendants' motion for summary judgment is fully briefed and is pending before this court. Dkt. 80-82, 97-98, 106.
3. Defendants filed a statement pursuant to Local Rule 56.1 concurrently with their motion, and Plaintiffs filed Local Rule 56.1 response and statement of additional facts concurrently with their response to Defendants' motion. Dkt. 81, 98-99.
4. Plaintiffs filed their motion for summary judgment and statement pursuant to Local Rule 56.1 on May 1, 2023. Dkt. 100-101.
5. Defendants' response to Plaintiffs' motion and response statement and any statement of additional facts pursuant to Local Rule 56.1 are due on or before June 1, 2023. Plaintiffs' reply, if any, is due on or before June 15, 2023. Dkt. 92.
6. Defendants move to adopt their Rule 56.1 Statement of Undisputed Material Facts (Dkt. 81) as their Statement of Additional Facts in response to Plaintiffs' motion for summary judgment. Plaintiffs move to adopt their response to Defendants' Statement of

Undisputed Material Facts (Dkt. 98) as their response to Defendants' Statement of Additional Facts in opposition to Plaintiffs' motion.

7. All parties are in agreement as to this motion.

WHEREFORE, Defendants respectfully request that this Honorable Court grant the parties leave to adopt their respective Rule 56.1 statements from Defendants' motion for summary judgment as their statements for Plaintiffs' motion for summary judgment, and for all other appropriate relief.

Dated: May 23, 2023

/s/ Edward M. Brener
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One of the attorneys for Defendants

CERTIFICATE OF SERVICE

I, Edward M. Brener, hereby certify that on May 23, 2022, I have caused a true and correct copy of the Agreed Motion to Adopt Cross-Statements of Undisputed Material Facts be sent via e-filing to all counsel of record in accordance with the rules regarding the electronic filing and service of documents.

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